

1 **LAGOMARSINO LAW**
2 ANDRE M. LAGOMARSINO, ESQ. (#6711)
3 CORY M. FORD, ESQ. (#15042)
4 3005 W. Horizon Ridge Pkwy., #241
Henderson, Nevada 89052
Telephone: (702) 383-2864
Facsimile: (702) 383-0065
5 *Attorneys for Plaintiff Jane Doe*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 JANE DOE, individually,

9 Plaintiff,

10 v.

11 BOYS AND GIRLS CLUBS OF SOUTHERN
12 NEVADA, a domestic corporation; F.P.
13 HOLDINGS, L.P., a domestic limited
14 partnership; SAN MANUEL GAMING AND
HOSPITALITY AUTHORITY d/b/a Palms
Casino Resort, a governmental instrumentality of
the San Manuel Band of Mission Indians,

15 Defendants.

16 CASE NO.: 2:23-cv-01202-RFB -BNW

17 **STIPULATION AND ORDER TO EXTEND**
THE DEADLINE TO FILE PLAINTIFF'S
OPPOSITION TO MOTION TO STRIKE
PURSUANT TO FRCP 12(f) (ECF No. 10)
(First Request)

18 Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record, hereby
19 stipulate and request that that this Court extend the deadline to file Plaintiff's Opposition to Motion
20 to Strike Pursuant to FRCP 12(f) (ECF No. 10) in the above-captioned case three (3) weeks, up to
and including Tuesday, September 26, 2023.

21 This Request for an extension of time is not sought for any improper purpose or other
22 purpose of delay and is Plaintiff's first request. This request for extension is based upon the
23 following:

24 Plaintiff's firm is currently in a twenty-five (25) day trial set in the Los Angeles Superior
25 Court that started August 1, 2023. The trial is anticipated to end on or before Wednesday, August 30,
26 2023. The handling attorney for Plaintiff was largely involved in the trial and just recently returned
27 home from Los Angeles last Thursday night, August 24, 2023. Additionally, the handling attorney
28

1 for the Plaintiff will be out of the country for his honeymoon for ten (10) days starting Tuesday,
2 August 29, 2023. The totality of Plaintiff's counsel unavailability calls for an extended period of
3 time.

4 This request for an extension is made in good faith and the parties respectfully request that
5 this Court extend the time to file Plaintiff's Opposition to Motion to Strike Pursuant to FRCP 12(f)
6 (ECF No. 10) three (3) weeks from the current deadline of September 5, 2023 up to, and including,
7 September 26, 2023.
8

9 **IT IS SO STIPULATED AND AGREED.**

10 DATED this 28th day of August, 2023.

11 **LAGOMARSINO LAW**

12 */s/ Cory M. Ford, Esq.*
13 ANDRE M. LAGOMARSINO, ESQ. (#6711)
14 CORY M. FORD, ESQ. (#15042)
15 3005 W. Horizon Ridge Pkwy., #241
16 Henderson, Nevada 89052
17 *Attorneys for Plaintiff Jane Doe*

18 DATED this 28th day of August, 2023.

19 **TYSON & MENDES LLP**

20 */s/ Priscilla L. O'Briant*
21 PRISCILLA L. O'BRIANT (#10171)
22 2835 St. Rose Pkwy, #140
23 Henderson NV 89052
24 *Attorneys for Defendant*
25 *Boys and Girls Clubs of Southern Nevada*

26 **ORDER**

27 **IT IS SO ORDERED**

28 **DATED:** 3:02 pm, August 29, 2023



29 **BRENDA WEKSLER**
30 **UNITED STATES MAGISTRATE JUDGE**